

IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

TYRONE HARRIS,
Movant,
v.
UNITED STATES OF AMERICA,
Respondent.

)
) Civil No. 20-00914-CV-W-GAF
) Crim. No. 11-00038-01-CR-W-GAF
)

MOTION OBJECTING GOVERNMENT'S MOTION
FOR 30-DAY EXTENSION OF TIME TO FILE
RESPONSE TO MOVANT'S MOTION TO VACATE

Come now the movant, Mr. Tyrone Harris,
pro se, praying for this Honorable Court's discretion
in this proceeding.

Movant objects government's request for
an extension of time to file a response. The
government erroneously had movant's sentence en-
hanced using three Missouri second degree burglaries
convictions in 2012. In light of Naylor, if movant
was sentenced today, his Missouri second-
degree burglary convictions, could no longer
be used as predicate violent felonies for
ACCA enhancement.

(2)

On January 29th 2021, movant will have completed the maximum term of 120 months imprisonment for being a felon in possession of a firearm. Any time beyond the above dated date, the movant hereby gives notice that he will seek \$1000⁰⁰ a day in monetary damages for being forced to served an 'illegal sentence. Thank you

Respectfully Submitted
Mr. Tyrone Harris
Mr. Tyrone Harris #15730-041
FCI-Florence
P.O. Box 6000
Florence, CO. 81226

Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was delivered on January 14, 2021 to the inmate mailbox addressed to

Ashleigh A. Ragner
Assistant United States Attorney
Violent Crime & Drug Trafficking Unit
400 East Ninth Street, Suite 5510
KANSAS City, MO 64106

Mr. Tyrone Harris
Mr. Tyrone Harris, pro se

Name: Mr. Tyronne Harris

Reg. No.: 15430-041

Federal Correctional Institution

P.O. Box 6000

Florence, CO. 81226

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CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF KANSAS
KANSAS CITY, MO

United States District Court
Western District of Missouri
400 East 9th Street

Kansas City MO 64106

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